

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

CR 424-0098

UNITED STATES OF AMERICA

v.

WILLIAM JOHNSON,
a/k/a "G,"
a/k/a "Gangsta,"
KEANNON WYCKOFF,
a/k/a "Cuz,"
a/k/a "Lank,"
a/k/a "Link,"

THOMAS BLAGMON,
JAMES BLAGMON,

a/k/a "G-Man,"
ERICK COLLINS,
a/k/a "Big E,"
a/k/a "E,"

CHRISTOPHER GRANT,
a/k/a "Crip,"
a/k/a "Scrappy,"

ANTWUAN BYRD,
DEDERICK BRYANT,
JACOB ROBINSON,
a/k/a "Miles,"
IRMA WYCKOFF,
a/k/a "Auntie," and
ISRAEL GRANT.

) INDICTMENT NO.
)
) FILED UNDER SEAL
)
) 21 U.S.C. § 841(a)(1)
) Distribution of Controlled Substances
)
) 21 U.S.C. § 841(a)(1)
) Possession With Intent to Distribute
) Controlled Substances
)
) 21 U.S.C. § 846
) Conspiracy to Possess With Intent to
) Distribute and to Distribute
) Controlled Substances
)
) 21 U.S.C. § 856(a)(1)
) Maintaining Drug-Involved Premises
)
) 18 U.S.C. § 922(g)(1)
) Possession of a Firearm by a
) Prohibited Person
)
) 18 U.S.C. § 924(c)
) Using and Carrying a Firearm During
) and in Relation to a Drug Trafficking
) Crime
)
) 18 U.S.C. § 2
) Aiding and Abetting

U.S. DISTRICT COURT
2024 OCT -8 PM 2:39
CLERK

THE GRAND JURY CHARGES THAT:

COUNT ONE

*Conspiracy to Possess With Intent to Distribute and
to Distribute Controlled Substances
(Cocaine, Cocaine Base, Fentanyl, Methamphetamine, Oxycodone and Marijuana)
21 U.S.C. § 846*

Beginning on a date at least as early as April 2023, up to and including the return date of this Indictment, the precise dates being unknown, in Bulloch, Chatham, and Liberty Counties, within the Southern District of Georgia, and elsewhere, the Defendants,

**WILLIAM JOHNSON,
a/k/a "G,"
a/k/a "Gangsta,"
KEANNON WYCKOFF,
a/k/a "Cuz,"
a/k/a "Lank,"
a/k/a "Link,"
THOMAS BLAGMON,
JAMES BLAGMON,
a/k/a "G-Man,"
ERICK COLLINS,
a/k/a "Big E,"
a/k/a "E,"
CHRISTOPHER GRANT,
a/k/a "Crip,"
a/k/a "Scrappy,"
ANTWUAN BYRD,
DEDERICK BRYANT,
JACOB ROBINSON,
a/k/a "Miles,"
IRMA WYCKOFF,
a/k/a "Auntie,"
and
ISRAEL GRANT,**

did knowingly and intentionally combine, conspire, confederate and agree together and with each other, and with others known and unknown, to possess with intent to

distribute and to distribute 500 grams or more of cocaine; 28 grams or more of cocaine base, 40 grams or more of a mixture or substance containing a detectable amount of Fentanyl; 50 grams or more of methamphetamine (actual); a mixture or substance containing a detectable amount of Oxycodone; all Schedule II controlled substances; and a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

Possession of a Firearm by a Prohibited Person
18 U.S.C. § 922(g)(1)

On or about July 3, 2023, in Chatham County, within the Southern District of Georgia, the Defendant,

**CHRISTOPHER GRANT,
a/k/a “Crip,”
a/k/a “Scrappy,”**

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit: Smith & Wesson, Model SD40VE, .40 caliber pistol, which had previously been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT THREE

Distribution of a Controlled Substance (Methamphetamine)

21 U.S.C. § 841(a)(1)

On or about July 11, 2023, in Liberty County, within the Southern District of Georgia, the Defendant,

**CHRISTOPHER GRANT,
a/k/a “Crip,”
a/k/a “Scrappy,”**

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

On or about July 11, 2023, in Liberty County, within the Southern District of Georgia, the Defendant,

**CHRISTOPHER GRANT,
a/k/a “Crip,”
a/k/a “Scrappy,”**

did knowingly possess a firearm in furtherance of at least one drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, *Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances*, in violation of Title 21, United States Code, Section 846, as charged in Count 1 of this Indictment, and *Possession with Intent to Distribute a Controlled Substance*, in violation of Title 21, United States Code, Section 841, as charged in Count 3 of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

COUNT FIVE

Possession of a Firearm by a Prohibited Person
18 U.S.C. § 922(g)(1)

On or about July 11, 2023, in Liberty County, within the Southern District of Georgia, the Defendant,

**CHRISTOPHER GRANT,
a/k/a “Crip,”
a/k/a “Scrappy,”**

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit: a Smith & Wesson, Model SD40, .40 caliber pistol, which had previously been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT SIX

Distribution of a Controlled Substance (Cocaine Base)

21 U.S.C. § 841(a)(1)

On or about August 18, 2023, in Liberty County, within the Southern District of Georgia, the Defendant,

CHRISTOPHER GRANT,

a/k/a “Crip,”

a/k/a “Scrappy,”

did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SEVEN

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

On or about August 18, 2023, in Liberty County, within the Southern District of Georgia, the Defendant,

**CHRISTOPHER GRANT,
a/k/a “Crip,”
a/k/a “Scrappy,”**

did knowingly possess a firearm in furtherance of at least one drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, *Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances*, in violation of Title 21, United States Code, Section 846, as charged in Count 1 of this Indictment, and *Possession with Intent to Distribute a Controlled Substance*, in violation of Title 21, United States Code, Section 841, as charged in Count 6 of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

COUNT EIGHT

Possession of a Firearm by a Prohibited Person
18 U.S.C. § 922(g)(1)

On or about August 18, 2023, in Liberty County, within the Southern District of Georgia, the Defendant,

**CHRISTOPHER GRANT,
a/k/a “Crip,”
a/k/a “Scrappy,”**

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit: a Sarismaz, Model B6C, 9mm pistol, which had previously been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT NINE

Distribution of a Controlled Substance (Methamphetamine)

21 U.S.C. § 841(a)(1)

On or about September 7, 2023, in Liberty County, within the Southern District of Georgia, the Defendant,

CHRISTOPHER GRANT,

a/k/a “Crip,”

a/k/a “Scrappy,”

did knowingly and intentionally distribute 5 grams or more of methamphetamine (actual), a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TEN

Possession of Firearms by a Prohibited Person
18 U.S.C. § 922(g)(1)

On or about September 28, 2023, in Liberty County, within the Southern District of Georgia, the Defendant,

**CHRISTOPHER GRANT,
a/k/a “Crip,”
a/k/a “Scrappy,”**

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, firearms, to wit: Ruger, Model Security 9, 9mm pistol, and a German Sports Guns, Model Firefly, .22 caliber pistol, which have previously been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT ELEVEN

Distribution of a Controlled Substance (Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about October 23, 2023, in Liberty County, within the Southern District of Georgia, the Defendant,

**WILLIAM JOHNSON,
a/k/a “G,”
a/k/a “Gangsta,”**

did knowingly and intentionally distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWELVE

Distribution of a Controlled Substance (Methamphetamine)

21 U.S.C. § 841(a)(1)

On or about November 20, 2023, in Liberty County, within the Southern District of Georgia, the Defendant,

**WILLIAM JOHNSON,
a/k/a “G,”
a/k/a “Gangsta,”**

did knowingly and intentionally distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTEEN

Distribution of a Controlled Substance (Methamphetamine)

21 U.S.C. § 841(a)(1)

On or about December 11, 2023, in Liberty County, within the Southern District of Georgia, the Defendant,

WILLIAM JOHNSON,

a/k/a “G,”

a/k/a “Gangsta,”

did knowingly and intentionally distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOURTEEN

Distribution of Controlled Substances (Methamphetamine, Cocaine)
21 U.S.C. § 841(a)(1)

On or about January 24, 2024, in Liberty County, within the Southern District of Georgia, the Defendant,

WILLIAM JOHNSON,
a/k/a “G,”
a/k/a “Gangsta,”

did knowingly and intentionally distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, and a mixture or substance containing a detectable amount of cocaine, both Schedule II controlled substances.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIFTEEN

Possession of a Firearm by a Prohibited Person
18 U.S.C. § 922(g)(1)

On or about February 8, 2024, in Liberty County, within the Southern District of Georgia, the Defendant,

**CHRISTOPHER GRANT,
a/k/a “Crip,”
a/k/a “Scrappy,”**

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit: a Ruger, Model AR-556, 5.56 caliber rifle, which had previously been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT SIXTEEN

Possession with Intent to Distribute a Controlled Substance (Fentanyl)
21 U.S.C. § 841(a)(1)

On or about March 14, 2024, in Bulloch County, within the Southern District of Georgia, the Defendants,

KEANNON WYCKOFF,
a/k/a “Cuz,”
a/k/a “Lank,”
a/k/a “Link,”
and
ERICK COLLINS,
a/k/a “Big E,”
a/k/a “E,”

aided and abetted by each other, did knowingly and intentionally possess with intent to distribute 40 grams or more of a mixture of substance containing a detectable amount of Fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT SEVENTEEN
Maintaining Drug-Involved Premises
21 U.S.C. § 856(a)(1)

Beginning on a date at least as early as July 2023, up to and including the return date of this Indictment, the precise dates being unknown, in Liberty County, within the Southern District of Georgia, the Defendant,

WILLIAM JOHNSON,
a/k/a “G,”
a/k/a “Gangsta,”

did lease, rent, use, and maintain a place located at 136 Cherrie Murrell Street, Hinesville, Georgia, for the purpose of distributing and storing cocaine, cocaine base, methamphetamine, Oxycodone, all Schedule II controlled substances, and marijuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 856(a)(1).

COUNT EIGHTEEN

*Possession with Intent to Distribute Controlled Substances (Fentanyl,
Methamphetamine, Cocaine)*

21 U.S.C. § 841(a)(1)

On or about May 15, 2024, in Liberty County, within the Southern District of Georgia, the Defendant,

**WILLIAM JOHNSON,
a/k/a “G,”
a/k/a “Gangsta,”**

did knowingly and intentionally possess with intent a mixture of substance containing a detectable amount of Fentanyl; a mixture of substance containing a detectable amount of methamphetamine, a mixture of substance containing a detectable amount of cocaine, all Schedule II controlled substances.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT NINETEEN

Maintaining Drug-Involved Premises

21 U.S.C. § 856(a)(1)

Beginning on a date at least as early as July 2023, up to and including the return date of this Indictment, the precise dates being unknown, in Liberty County, within the Southern District of Georgia, the Defendant,

**WILLIAM JOHNSON,
a/k/a “G,”
a/k/a “Gangsta,”**

did lease, rent, use, and maintain a place located at 137 Glenn Bryant Road, Hinesville, Georgia, for the purpose of distributing and storing cocaine, cocaine base, methamphetamine, Oxycodone, all Schedule II controlled substances, and marijuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 856(a)(1).

COUNT TWENTY

Possession with Intent to Distribute Controlled Substances
(Cocaine, Cocaine Base, Fentanyl)
21 U.S.C. § 841(a)(1)

On or about May 15, 2024, in Liberty County, within the Southern District of Georgia, the Defendant,

WILLIAM JOHNSON,
a/k/a “G,”
a/k/a “Gangsta,”

did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, a mixture or substance containing a detectable amount of cocaine base, and a mixture or substance containing a detectable amount of Fentanyl, all Schedule II controlled substances.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-ONE

Possession of a Firearm by a Prohibited Person
18 U.S.C. § 922(g)(1)

On or about May 15, 2024, in Bulloch County, within the Southern District of Georgia, the Defendant,

**WILLIAM JOHNSON,
a/k/a “G,”
a/k/a “Gangsta,”**

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit: Taurus .38 special caliber revolver, which had previously been transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWENTY-TWO

*Possession with Intent to Distribute a Controlled Substance
(Cocaine Base)*

21 U.S.C. § 841(a)(1)

On or about May 15, 2024, in Liberty County, within the Southern District of Georgia, the Defendant,

**CHRISTOPHER GRANT,
a/k/a “Crip,”
a/k/a “Scrappy,”**

did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-THREE

Possession with Intent to Distribute a Controlled Substance
(Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about May 15, 2024, in Bulloch County, within the Southern District of Georgia, the Defendant,

KEANNON WYCKOFF,
a/k/a “Cuz,”
a/k/a “Lank,”
a/k/a “Link,”

did knowingly and intentionally possess with intent to distribute 5 grams or more of methamphetamine (actual), a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-FOUR

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

On or about May 15, 2024, in Bulloch County, within the Southern District of Georgia, the Defendant,

KEANNON WYCKOFF,
a/k/a “Cuz,”
a/k/a “Lank,”
a/k/a “Link,”

did knowingly possess a firearm in furtherance of at least one drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, *Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances*, in violation of Title 21, United States Code, Section 846, as charged in Count 1 of this Indictment, and *Possession with Intent to Distribute a Controlled Substance*, in violation of Title 21, United States Code, Section 841, as charged in Count 23 of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

COUNT TWENTY-FIVE

Possession of a Firearm by a Prohibited Person
18 U.S.C. § 922(g)(1)

On or about May 15, 2024, in Bulloch County, within the Southern District of Georgia, the Defendant,

KEANNON WYCKOFF,
a/k/a “Cuz,”
a/k/a “Lank,”
a/k/a “Link,”

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit: Smith and Wesson .40 caliber handgun, which had previously been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWENTY-SIX

Possession with Intent to Distribute Controlled Substances
(Cocaine, Cocaine Base, Fentanyl)
21 U.S.C. § 841(a)(1)

On or about May 15, 2024, in Liberty County, within the Southern District of Georgia, the Defendants,

THOMAS BLAGMON,
and
JAMES BLAGMON,
a/k/a “G-Man,”

aided and abetted by each other, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, a mixture or substance containing a detectable amount of cocaine base, and a mixture or substance containing a detectable amount of Fentanyl, all Schedule II controlled substances.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT TWENTY-SEVEN
Maintaining Drug-Involved Premises
21 U.S.C. § 856(a)(1)

Beginning on a date at least as early as September 2023, up to and including the return date of this Indictment, the precise dates being unknown, in Liberty County, within the Southern District of Georgia, the Defendants,

WILLIAM JOHNSON,
a/k/a “G,”
a/k/a “Gangsta,”
CHRISTOPHER GRANT,
a/k/a “Crip,”
a/k/a “Scrappy,”
and
ISRAEL GRANT,

did lease, rent, use, and maintain a place located at 949 Whippoorwill Way, Hinesville, Georgia, for the purpose of distributing and storing cocaine, cocaine base, and Fentanyl, all Schedule II controlled substances.

All in violation of Title 21, United States Code, Section 856(a)(1).

COUNT TWENTY-EIGHT

Possession with Intent to Distribute Controlled Substances
(Cocaine and Marijuana)
21 U.S.C. § 841(a)(1)

On or about May 15, 2024, in Liberty County, within the Southern District of Georgia, the Defendants,

WILLIAM JOHNSON,
a/k/a “G,”
a/k/a “Gangsta,”
KEANNON WYCKOFF,
and
IRMA WYCKOFF,
a/k/a “Auntie,”

aided and abetted by each other, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, and a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT TWENTY-NINE

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

On or about May 15, 2024, in Liberty County, within the Southern District of Georgia, the Defendant,

**IRMA WYCKOFF,
a/k/a “Auntie,”**

did knowingly possess a firearm in furtherance of at least one drug trafficking crime for which she may be prosecuted in a court of the United States, to wit, *Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances*, in violation of Title 21, United States Code, Section 846, as charged in Count 1 of this Indictment, and *Possession with Intent to Distribute a Controlled Substance*, in violation of Title 21, United States Code, Section 841, as charged in Count 28 of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

COUNT THIRTY

Possession of Firearms by a Prohibited Person
18 U.S.C. § 922(g)(1)

On or about May 15, 2024, in Liberty County, within the Southern District of Georgia, the Defendant,

IRMA WYCKOFF,
a/k/a “Auntie,”

knowing she had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, firearms, to wit: SCCY CPX-1 9mm handgun and a TNW Inc. ASR 10mm rifle, which have previously been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT THIRTY-ONE

Possession of a Firearm by a Prohibited Person

18 U.S.C. § 922(g)(1)

On or about May 15, 2024, in Liberty County, within the Southern District of Georgia, the Defendant,

JACOB ROBINSON,

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit: Glock .40 caliber handgun, which had previously been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATIONS
(18 U.S.C. § 924(d)(1), 21 U.S.C. § 853, and 28 U.S.C. § 2461(c))

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d), Title 21, United States Code, Section 853(a), and Title 28, United States Code, Section 2461(c).

Upon conviction of one or more offenses listed in this Indictment, the Defendants shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d), Title 21, United States Code, Section 853(a), and Title 28, United States Code, Section 2461(c), any firearm and ammunition involved in the commission of the offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to:

- a Smith & Wesson, Model SD40VE, .40 caliber pistol bearing serial number HFD0597;
- a Ruger, Model AR-556, 5.56 caliber rifle bearing serial number 85836431;
- a Smith & Wesson, Model SD40, .40 caliber pistol bearing serial number FDU4194;
- a Sarismaz, Model B6C, 9mm pistol bearing serial number T-1102-18G00888;
- a Ruger, Model Security 9, 9mm pistol bearing serial number 38492130;
- a German Sports Guns, Model Firefly, .22 caliber pistol bearing serial number P481937;
- a Taurus .38 special caliber revolver bearing serial number BM11519;
- a Smith & Wesson .40 caliber pistol bearing serial number HWR0745;
- a SCCY CPX-1 9mm pistol bearing serial number 238384;
- a TNW Inc. ASR 10mm rifle bearing serial number M5764;
- a Glock .40 caliber pistol bearing serial number DSV555US; and


- Associated magazines and ammunition.


If any of the property described above, as a result of any act or commission of any Defendant:


- cannot be located upon the exercise of due diligence;
- has been transferred or sold to, or deposited with, a third party;
- has been placed beyond the jurisdiction of the court;
- has been substantially diminished in value; or
- has been commingled with other property which cannot be divided without difficulty,

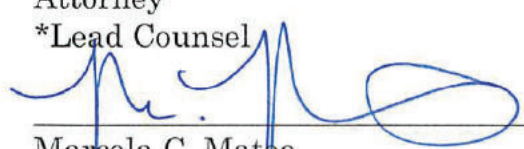
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A True Bill.



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